

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**OFFICIAL COMMITTEE OF JANUARY 24 CLAIMANTS'  
APPLICATION TO EMPLOY BURNS BOWEN BAIR LLP  
AS SPECIAL COUNSEL TO THE COMMITTEE**

THIS MOTION SEEKS ENTRY OF AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

**To the Honorable Marvin Isgur,  
United States Bankruptcy Judge:**

The Official Committee of January 24 Claimants (the “Committee”) files this application (the “Application”) to employ Burns Bowen Bair LLP (“Burns”), as special counsel to the Committee pursuant to 11 U.S.C. §§ 328(a) and 1103(a), together with the Declaration of Timothy W. Burns (the “Burns Declaration”), which is attached as Exhibit A of this Application.

**PRELIMINARY STATEMENT**

1. The Committee respectfully requests that the Court authorize the employment of Burns as special counsel to the Committee under section 1103(a) of Title 11 of the United States Code (the “Bankruptcy Code”). The Committee has engaged Burns to advise and represent its interests in specialized insurance matters that may arise during the pendency of Watson Grinding & Manufacturing Co.’s (the “Debtor”) bankruptcy case.

**JURISDICTION AND VENUE**

2. This Court has jurisdiction over these cases pursuant to 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. §§ 157(b)(2)(A) and (O). The relief requested in the Application is authorized under sections 328(a) and 1103(a) of the Bankruptcy Code.

3. Venue is proper in this district pursuant to 28 U.S.C. § 1408.

**BACKGROUND**

4. On February 6, 2020 (the “Petition Date”), the Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (the “Bankruptcy Case”).<sup>1</sup>

5. The Debtor continues to operate its business as a debtor and debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On February 21, 2020, the United States Trustee for the Southern District of Texas (the “U.S. Trustee”) appointed the Official Committee of January 24 Claimants pursuant to sections 1102(a) and 1102 (b)(1) of the Bankruptcy Code. The Committee consists of the following claimants: (i) Travis Horton, (ii) Massiel Nunez, (iii) Houston Corvette Service, (iv) Margarita Flores, (v) Phillip Burnam, (vi) Janette Thomas, and (vii) Gerardo Castorena, Jr. [Docket No. 89].

6. To date, no trustee or examiner has been appointed in this Bankruptcy Case.

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<sup>1</sup> Watson Valve Services, Inc. (the “Watson Valve”) also filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code on February 6, 2020.

**RELIEF REQUESTED**

7. By this Application, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, the Committee respectfully requests entry of an order authorizing the Committee to employ and retain Burns as special counsel to the Committee pursuant to the terms of the engagement letter, dated March 26, 2020, and attached as **Exhibit B** of this Application (the “Engagement Letter”).

8. Specifically, the Committee retained Burns to serve as the Committee’s insurance counsel in the Debtor’s bankruptcy case.

**BASIS TO RETAIN LUGENBUHL AS SPECIAL COUNSEL**

**A. Burns’s Qualifications**

9. Burns represents a wide array of constituencies in insurance related matters, including general liability insurance, directors’ and officers’ insurance, professional liability insurance, fiduciary liability insurance, cyber insurance, property insurance, and crime and fidelity insurance. Burns also has experience serving as counsel for corporations, as well as counsel to individual plaintiffs in insurance and liability disputes. Importantly, Burns represents insured parties and not insurance companies.

10. Burns has vast experience in complex insurance disputes and contested issues, including coverage litigation, insurance class actions, counterparty disputes with insurers, and domestic and international insurance arbitration. Additionally, Burns also has extensive experience advising and working in concert with other attorneys to navigate discrete insurance issues in the context of complex litigation proceedings.

## B. The Engagement

11. The Committee has engaged Burns on the terms and conditions set forth in the Engagement Letter. Accordingly, Burns has or will perform the following services<sup>2</sup> on the Committee's behalf, including but not limited to:

- (a) Providing guidance and counsel to the Committee in connection with insurance matters in the Debtor's bankruptcy case; and
- (b) Any and all other additional matters as may be directed and agreed in writing between the Committee and Burns.

## C. PROPOSED COMPENSATION

12. Under the Engagement Letter, Burns will be retained on an hourly basis and will issue monthly invoices for all fees and reasonable expenses incurred in the prior month, which will be billed hourly in 1/10th hour increments at the following agreed hourly rates:

Professional	Hourly Rate
Timothy W. Burns (TWB)	\$872.00
Jeff James Bowen (JJB)	\$616.00
Freya K. Bowen (FKB)	\$600.00
Jesse J. Bair (JB)	\$500.00
Paralegals and Clerks	\$300.00

13. Other than as set forth above and in the Burns Declaration, no arrangement is proposed between the Committee, on the one hand, and Burns, on the other hand, for compensation to be paid in these Chapter 11 Cases.

14. Burns has further informed the Committee that except for sharing arrangements among Burns and its respective shareholders, it has no agreement with any other entity to share any compensation received, nor will any be made, except as permitted under section 504(b)(1) of the Bankruptcy Code.

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<sup>2</sup> This description is a summary of services provided by Burns. If any inconsistency exists between this description and the terms of the Engagement Letter, the Engagement Letter controls.

**D. No Adverse Interest**

15. Bankruptcy Code section 1103(b) does not require that Burns be a “disinterested person” under Bankruptcy Code section 101(14), but only that Burns not hold any interests adverse to the Committee or its members with respect to the matters for which Burns is to be employed.

16. To the best of the Committee’s knowledge, and as set forth in the accompanying Burns Declaration, the partners of Burns do not hold or represent any interest adverse to the Committee or its members with respect to the matters for which Burns will be retained.

**AUTHORITY FOR RELIEF REQUESTED**

17. The Committee seeks to retain Burns pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code. The Committee respectfully submits that the terms of the proposed engagement of Burns including, without limitation, its fees, should be approved.

18. The proposed retention of Burns is appropriate under Bankruptcy Code section 1103(a). Specifically, pursuant to Bankruptcy Code section 1103(a), upon approval of a majority of the Committee’s members and with the Court’s approval, the Committee may “select and authorize the employment . . . of one or more attorneys . . . to represent or perform services for such committee.” 11 U.S.C. § 1103(a).

19. Burns’s retention as special counsel is necessary and in the best interest of the Committee, its members, and the Debtor because accurate interpretation and potential litigation involving the Debtor’s insurance policies will play a critical role in the outcome of this bankruptcy case. Burns is well qualified to serve as special counsel in such capacity, given its experience in the specialized field of insurance litigation. Additionally, since the terms of Burns’s engagement is limited to representing the Committee in pending insurance matters, there is no risk of duplication of services with the Committee’s other retained professionals.

20. Accordingly, based on the facts and for the reasons stated herein and in the Burns Declaration, the retention of Burns as special counsel to the Committee pursuant to this Application is reasonable, necessary and appropriate, and satisfies the requirements of sections 328(a) and 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a).

**CONCLUSION**

21. The Committee respectfully request that the Court enter the proposed order (a) approving the retention of Burns as special counsel to the Committee pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code; (b) approving the compensation terms set out above; and (c) granting such other and further relief as may be just and proper.

Dated: April 15, 2020

Respectfully submitted,

**PORTER HEDGES LLP**

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl  
Aaron J. Power  
1000 Main Street, 36th Floor  
Houston, Texas 77002  
(713) 226-6000  
(713) 226-6248 (fax)  
[jwolfshohl@porterhedges.com](mailto:jwolfshohl@porterhedges.com)  
[apower@porterhedges.com](mailto:apower@porterhedges.com)

**PROPOSED COUNSEL FOR THE OFFICIAL  
COMMITTEE OF JANUARY 24 CLAIMANTS**

**CERTIFICATE OF SERVICE**

This will certify that a true and correct copy of the foregoing document was forwarded by U.S. First Class Mail and via electronic transmission to all registered ECF users appearing in the case on April 15, 2020.

*/s/ Joshua W. Wolfshohl*  
Joshua W. Wolfshohl

## SERVICE LIST

ERIN E JONES  
 CHRISTOPHER R MURRAY  
 JONES MURRAY & BEATTY LLP  
 4119 MONTROSE STE 230  
 HOUSTON TX 77006

STEPHEN DOUGLAS STATHAM  
 OFFICE OF US TRUSTEE  
 515 RUSK STE 3516  
 HOUSTON TX 77002

ASTRO ALLOYS INC  
 9155 EMMOTT RD  
 HOUSTON TX 77040

BAKER BOTTS LLP  
 910 LOUISIAN ST STE 3200  
 HOUSTON TX 77002

C&M TECHNOLOGIES GROUP INC  
 350 NORTH SAINT PAUL ST  
 DALLAS TX 75201

EARL M JORGENSEN  
 6201 LUMERDALE RD  
 HOUSTON TX 77092

GULFCO FORGE COMPANY  
 6817 INDUSTRIAL RD  
 HOUSTON TX 77005

HALCO METALS  
 9611 TELGE RD  
 HOUSTON TX 77095

HUNTER CHEMICAL LLC  
 220 COMMERCE DR  
 STE 200  
 FORT WASHINGTON PA 19034

LINEAGE ALLOYS  
 1901 ELLIS SCHOOL RD  
 BAYTOWN TX 77521

MATHESON TRI-GAS  
 166 KEYSTONE DR  
 MONTGOMERYVILLE PA 18936

NORTH AMERICAN HOGANAS CO  
 111 HOGANAS WA  
 HOLLSOPPLE PA 15935

NORTON ROSE FULBRIGHT  
 1301 MCKINNEY ST STE 1500  
 HOUSTON TX 77010

PARRISH INTERNATIONAL INC  
 PO BOX 468  
 HEMPSTEAD TX 77445

SCOTT STAINLESS SPECIALITIES  
 501 GEORGIA AVENUE  
 SOUTH HOUSTON TX 77587

TECHNICAL ENGINEERING LLC  
 100 CHAPEL RD  
 MANCHESTER CT 6042

THYSSENKRUPP  
 ATTN: GENERAL COUNSEL  
 111 W JACKSON BLVD  
 CHICAGO IL 60604

TRICOR METALS  
 3517 N LOOP 336 W  
 CONROE TX 77304

VICTORY METALS  
 4125 HOLLISTER RD  
 HOUSTON TX 77080

VINATECH ENGINEERING  
 7747 FORMULA PLACE  
 SAN DIEGO CA 92121

WEBB INDUSTRIAL LLC  
 2433 LOFTON TERRACE  
 FORT WORTH TX 76109

WATSON VALVE SERVICES INC  
 4525 GEESNER RD  
 HOUSTON TX 77041

TEXAS CAPITAL BANK  
 C/O TIMOTHY MILLION  
 600 TRAVIS ST  
 HOUSTON TX 77002

INTERNAL REVENUE SERVICE  
 CENTRALIZED INSOLVENCY  
 OPERATION  
 PO BOX 7346  
 P

INTERNAL REVENUE SERVICE  
 300 E 8TH ST  
 MAIL STOP 5026AUS  
 AUSTIN TX 78701

RICHARD A KINCHELOE  
 ASSISTANT UNITED STATES ATTORNEY  
 SOUTHERN DISTRICT OF TEXAS  
 1000 LOUISIANA ST STE 2300  
 HOUSTON TX 77002

ABIGAIL RUSHING RYAN AAG  
 OFFICE OF THE AG OF TEXAS  
 BANKRUPTCY & COLLECTIONS DIV  
 PO BOX 12548-MC 008  
 AUSTIN TX 78711-2548

JASON B BINFORD  
 OFFICE OF THE AG OF TEXAS  
 BANKRUPTCY & COLLECTIONS DIV  
 P O BOX 12548-MC 008  
 AUSTIN TEXAS 78711-2548

TIMOTHY A MILLION  
 HUSCH BLACKWELL LLP  
 600 TRAVIS ST STE 2350  
 HOUSTON TEXAS 77002

J SCOTT DOUGLASS  
 1811 BERING DR STE 420  
 HOUSTON TEXAS 77057

MUHAMMAD AZIZ  
 ABRAHAM WATKINS NICHOLS  
 SORRELS AGOSTO AZIZ & STOGNER  
 800 COMMERCE ST  
 HOUSTON TEXAS 77002

JOHN P DILLMAN  
 LINEBARGER GOGGAN BLAIR &  
 SAMPSON LLP  
 PO BOX 3064  
 HOUSTON TX 77253-3064

AVISHAY MOSHENBERG  
 McDOWELL HETHERINGTON LLP  
 1001 FANNIN STE 2700  
 HOUSTON TX 7700

RANDALL J POELMA JR  
 DOYEN SEBESTA & POELMA LLLP  
 450 GEARS RD STE 350  
 HOUSTON TX 77067

ELIZABETH C FREEMAN  
 JACKSON WALKER LLP  
 1401 MCKINNEY ST STE 1900  
 HOUSTON TX 77010

RANDY W WILLIAMS  
 BYMAN & ASSOCIATES PLLC  
 7924 BRDWAY STE 104  
 PEARLAND TX 775

L LEE THWEATT  
 ONE GREENWAY PLAZA STE 100  
 HOUSTON TX 77046-0102

STEPHEN R WALKER  
 LAW OFFICES OF MANUEL SOLIS PC  
 6657 NAVIGATION BLVD  
 HOUSTON TX 77011

BYRON C ALFRED  
 2019 WICHITA ST  
 HOUSTON TX 77004

MATT L MARTIN  
 ZEHL & ASSOCIATES PC  
 2700 POST OAK BLVD STE 1000  
 HOUSTON TX 77056

HENRY FLORES  
 RAPP & KROCK PC  
 1980 POST OAK BLVD STE 1200  
 HOUSTON TEXAS 77056

JARROD B MARTIN  
 McDOWELL HETHERINGTON LLP  
 1001 FANNIN STE 2700  
 HOUSTON TX 77002

ERIKA L MORABITO  
 FOLEY & LARDNER LLP  
 3000 K ST NW STE 600  
 WASHINGTON DC 20007

WILLIAM T SEBESTA  
 DOYEN SEBESTA & POELMA LLLP  
 450 GEARS RD STE 350  
 HOUSTON TX 77067

RYAN E CHAPPLE  
 CAIRN & SKARNULIS PLLC  
 400 W 15<sup>TH</sup> ST STE 900  
 AUSTIN TX 78701

ABIGAIL RUSHING RYAN AAG  
 OFFICE OF THE AG OF TEXAS  
 BANKRUPTCY & COLLECTIONS DIV  
 PO BOX 12548-MC 008  
 AUSTIN TX 78711-2548

JOSEPH D TERRY  
 ONE GREENWAY PLAZA STE 100  
 HOUSTON TX 77046-0102

GREGORY J FINNEY  
 LAW OFFICES OF MANUEL SOLIS PC  
 6657 NAVIGATION BLVD  
 HOUSTON TX 77011

RYAN H ZEHL  
 ZEHL & ASSOCIATES PC  
 2700 POST OAK BLVD STE 1000  
 HOUSTON TX 77056

GREGORY F COX  
 MOSTYLN LAW  
 3810 WEST ALABAMA ST  
 HOUSTON TX 77027

KENNETH M KROCK  
 RAPP & KROCK PC  
 1980 POST OAK BLVD STE 1200  
 HOUSTON TEXAS 77056

KATE H EASTERLING  
 McDowell Hetherington LLP  
 1001 FANNIN STE 2700  
 HOUSTON TX 77002

HOLLAND N O'NEIL  
 FOLEY & LARDNER LLP  
 2021 MCKINNEY AVENUE STE 1600  
 DALLAS TX 75201

BRUCE J Ruzinsky  
 JACKSON WALKER LLP  
 1401 MCKINNEY ST STE 1900  
 HOUSTON TX 77010

TAYLOR R ROMERO  
 CAIRN & SKARNULIS PLLC  
 400 W 15<sup>TH</sup> ST STE 900  
 AUSTIN TX 78701

JASON B BINFORD  
 OFFICE OF THE AG OF TEXAS  
 BANKRUPTCY & COLLECTIONS DIV  
 P O BOX 12548-MC 008  
 AUSTIN TEXAS 78711-2548

ANNA DEAN KAMINS  
 KAMINS LAW FIRM PLLC  
 2925 RICHMOND AVENUE STE 1200  
 HOUSTON TX 77098

JUAN A SOLIS  
 LAW OFFICES OF MANUEL SOLIS PC  
 6657 NAVIGATION BLVD  
 HOUSTON TX 77011

MATTHEW O GREENBERG  
 ZEHL & ASSOCIATES PC  
 2700 POST OAK BLVD STE 1000  
 HOUSTON TX 77056

MICHAEL DOWNEY  
 MOSTYLN LAW  
 3810 WEST ALABAMA ST  
 HOUSTON TX 77027

CATHRYN J SCHEXNAIDER  
MOSTYLN LAW  
3810 WEST ALABAMA ST  
HOUSTON TX 77027

CHANCE A MCMILLAN  
MCMILLAN FIRM PLLC  
440 LOUISIANA ST STE 1200  
HOUSTON TX 77002-1691

MATHEW MENDOZA  
MCMILLAN FIRM PLLC  
440 LOUISIANA ST STE 1200  
HOUSTON TX 77002-1691

ANTHONY G BUZBEE  
JP MORGAN CHASE TOWER  
600 TRAVIS ST STE 7300  
HOUSTON TX 77002

CHRISTOPHER J LEAVITT  
JP MORGAN CHASE TOWER  
600 TRAVIS ST STE 7300  
HOUSTON TX 77002

RYAN S PIGG  
JP MORGAN CHASE TOWER  
600 TRAVIS ST STE 7300  
HOUSTON TX 77002

MUHAMMAD S AZIZ  
800 COMMERCE ST  
HOUSTON TX 77002

KARL P LONG  
800 COMMERCE ST  
HOUSTON TX 77002

BILAAL BADAT  
4151 SOUTHWEST FWY STE 320  
HOUSTON TX 77027

MARTY HERRING  
MARTY HERRING & ASSOCIATES  
1616 S VOSS RD STE 890  
HOUSTON TX 77057

CAMERON R TEBO  
MARTY HERRING & ASSOCIATES  
1616 S VOSS RD STE 890  
HOUSTON TX 77057

MICHAEL TATE BARKLEY  
BAIN & BARKLEY  
14090 SOUTHWEST FWY STE 450  
SUGAR LAND TX 77478

KARL R SCHNEIDER  
BAIN & BARKLEY  
14090 SOUTHWEST FWY STE 450  
SUGAR LAND TX 77478

BRETT ANTHONY  
ANTHONY PETERSON LLP  
500 NORTH WATER ST STE 1000  
CORPUS CHRISTI TX 78401

ADAM ANTHONY  
ANTHONY PETERSON LLP  
500 NORTH WATER ST STE 1000  
CORPUS CHRISTI TX 78401

DONALD PETERSON  
ANTHONY PETERSON LLP  
500 NORTH WATER ST STE 1000  
CORPUS CHRISTI TX 78401

RUBEN BONILLA JR  
BONILLA & CHAPPA PC  
2600 GESSNER RD STE 136  
HOUSTON TX 77080

VINCE RYAN  
HARRIS COUNTY ATTORNEY  
ENVIRONMENTAL GROUP  
1019 CONGRESS 15TH  
FLOOR  
HOUSTON TX 77002

SARAH JANE UTLEY  
HARRIS COUNTY ATTORNEY  
ENVIRONMENTAL GROUP  
1019 CONGRESS 15TH FLOOR  
HOUSTON TX 77002

KATHY PORTER  
AIR COMPLIANCE COORDINATOR  
HARRIS COUNTY POLLUTION  
CONTROL SVCS DEPT  
101 SOUTH RICHEY STE H  
PASADENA TX 77506

ROBERT S KWOK  
9805 KATY FWY STE 850  
HOUSTON TX 77024

J RYAN LOYA  
9805 KATY FWY STE 850  
HOUSTON TX 77024

JOSHUA R LEAL  
9805 KATY FWY STE 850  
HOUSTON TX 77024

ALEX P BOYLHART  
9805 KATY FWY STE 850  
HOUSTON TX 77024

WILLIAM W HOKE (OF COUNSEL)  
9805 KATY FWY STE 850  
HOUSTON TX 77024

HUSEIN HADI  
SEDRICK STAGG  
7100 REGENCY SQUARE BLVD STE 140  
HOUSTON TX 77036

JAMIL THOMAS  
SEDRICK STAGG  
7100 REGENCY SQUARE BLVD STE 140  
HOUSTON TX 77036

CARNEGIE H MIMS III  
SEDRICK STAGG  
7100 REGENCY SQUARE BLVD STE 140  
HOUSTON TX 77036

ERIC DICK LLM  
3701 BROOKWOODS DR  
HOUSTON TX 77092

JOEL C SIMON  
FERNELIUS SIMON MACE  
ROBERTSON PERDUE PLLC  
4119 MONTROSE BLVD STE 500  
HOUSTON TX 77006

STEPHEN M FERNELIUS FERNELIUS SIMON MACE ROBERTSON PERDUE PLLC 4119 MONTROSE BLVD STE 500 HOUSTON TX 77006	RYAN M PERDUE FERNELIUS SIMON MACE ROBERTSON PERDUE PLLC 4119 MONTROSE BLVD STE 500 HOUSTON TX 77006	DEREK H POTTS POTTS LAW FIRM 3737 BUFFALO SPEEDWAY STE 1900 HOUSTON TX 77098
POTTS LAW FIRM 3737 BUFFALO SPEEDWAY STE 1900 HOUSTON TX 77098	MICHAEL J BINS POTTS LAW FIRM 3737 BUFFALO SPEEDWAY STE 1900 HOUSTON TX 77098	RILEY L BURNETT JR BURNETT LAW FIRM 3737 BUFFALO SPEEDWAY STE 1850 HOUSTON TX 77098
PEGAH RAHGOZAR 2825 WILCREST DR STE 515 HOUSTON TX 77045	LESTER B NICHOLS III 2825 WILCREST DR STE 515 HOUSTON TX 77045	KURT B ARNOLD ARNOLD & ITKIN LLP 6009 MEMORIAL DR HOUSTON TX 77007
JASON A ITKIN ARNOLD & ITKIN LLP 6009 MEMORIAL DR HOUSTON TX 77007	J KYLE FINDLEY ARNOLD & ITKIN LLP 6009 MEMORIAL DR HOUSTON TX 77007	KALA F SELLERS ARNOLD & ITKIN LLP 6009 MEMORIAL DR HOUSTON TX 77007
ADAM D LEWIS ARNOLD & ITKIN LLP 6009 MEMORIAL DR HOUSTON TX 77007	CHRISTOPHER L BELL GREENBERG TRAURIG LLP 1000 LOUISIANA ST STE 1700 HOUSTON TX 77002	GREGORY F COX MOSTYN LAW 3810 WEST ALABAMA ST HOUSTON TX 77027
MICHAEL A DOWNEY MOSTYN LAW 3810 WEST ALABAMA ST HOUSTON TX 77027	CAROLINE L MAIDA MOSTYN LAW 3810 WEST ALABAMA ST HOUSTON TX 77027	MARY-OLGA LOVETT GREENBERG TRAURIG LLP 1000 LOUISIANA ST STE 1700 HOUSTON TX 77002
PAUL B KERLIN GREENBERG TRAURIG LLP 1000 LOUISIANA ST STE 1700 HOUSTON TX 77002	CHRISTOPHER M LAVIGNE GREENBERG TRAURIG LLP 2200 ROSS AVE STE 5200 DALLAS TX 75201	KARL D BURRER GREENBERG TRAURIG LLP 1000 LOUISIANA ST STE 1700 HOUSTON TX 77002
JAMES R JONES 4185 TECHNOLOGY FOREST BLVD STE 160 THE WOODLANDS TX 77381	JOHN V MCCOY MCCOY LEAVITT & LASKEY N19 W242000 RIVERWOOD DR STE 125 WAUKESHA WI 53188	ANA M ENE CLARK LOVE & HUTSON PLLC 440 LOUISIANA STE 1700 HOUSTON TX 77002
MATHESON TRI-GAS INC ATTN: GENERAL COUNSEL 150 ALLEN RD - STE 302 BASKING RIDGE NJ 07920	AUTOMATION PLUS ATTN: FRANK LOMELO 8930 LAWNDALE ST STE F HOUSTON TX 77012	ADAM D PEAVY CLARK LOVE & HUTSON PLLC 440 LOUISIANA STE 1700 HOUSTON TX 77002
KEVIN M MADDEN LAW OFFICES OF KEVIN M MADDEN 5225 KATY FWY STE 520 HOUSTON TX 77007	MARK W MORAN MUNCK WILSON MANDALA LLP 12770 COIT RD STE 600 DALLAS TX 75251	ARC SPECIALTIES INC ATTN: L DON KNIGHT 8100 WASHINGTON STE 1000 HOUSTON TX 77007

ARC SPECIALTIES INC  
1730 STEBBINS DR  
HOUSTON TX 77004

CENTERPOINT ENERGY SERVICE  
COMPANY LCC  
ATTN: GENERAL COUNSEL  
1111 LOUISIANA ST 39TH FLOOR  
HOUSTON TX 77002

CENTERPOINT ENERGY SERVICES  
INC  
ATTN: GENERAL COUNSEL  
1111 LOUISIANA ST  
39TH FLOOR  
HOUSTON TX 77002

CENTERPOINT ENERGY RESOURCES  
CORP  
ATTN: GENERAL COUNSEL  
1111 LOUISIANA ST 39TH FLOOR  
HOUSTON TX 77002

CENTERPOINT ENERGY GAS  
SERVICES INC – NATURAL GAS  
ATTN: GENERAL COUNSEL  
1111 LOUISIANA ST 39TH FLOOR  
HOUSTON TX 77002

STM & ASSOCIATES  
8554 KATY FWY STE 112  
HOUSTON TX 77024

3M  
3M CORPORATE HEADQUARTERS  
2501 HUDSON RD  
MAPLEWOOD MN 55144

DETCON  
3M CENTER BLDG 224-5N40  
SAINT PAUL MN 55144-1001

DETCON  
3200 RESEARCH FOREST DR  
THE WOODLANDS TX 77381-4219

DETCON  
4055 TECHNOLOGY FOREST BLVD  
THE WOODLANDS TX 77381

FIRESTONE CRYOGENIC EQUIPMENT  
14954 EAST DR  
CONROE TX 77302-6600

FIRESTONE CRYOGENIC EQUIPMENT  
ATTN: LINDA PLUMMER  
12446 CUTTEN RD  
HOUSTON TX 77066

RADNOR  
AIRGAS INC  
259 NORTH RADNOR-CHESTER RD  
STE 100  
RADNOR PA 19087-5283

OLDHAM A/K/A TELEDYNE GAS & FLAME  
AMERICAS – THE WOODLANDS  
DETCON INC  
4055 TECHNOLOGY FOREST BLVD  
THE WOODLANDS TX 77381

WESTERN INTERNATIONAL GAS &  
CYLINDER INC  
ATTN: DENISE C HAUGEN  
7173 HIGHWAY 159 E PO BOX 668  
BELLVILLE TX 77418

MILLER SCAMARDI AND CARRABA  
ATTN: DAVID MILLER  
6525 WASHINGTON AVE  
HOUSTON TEXAS 77007

ASTRO ALLOYS  
ATTN: KEN WHITED  
9155 EMMOTT RD  
HOUSTON TX 77040

NATIONAL ALLOY SOLUTIONS  
C/O GONZALEZ & ASSOCIATES  
ATTN: EDWARD GONZALEZ  
2205 FULTON ST  
HOUSTON TX 77009

KENNAMETAL INC  
ATTN: MICHELLE R KEATING  
525 WILLIAM PENN PLACE STE 3300  
PITTSBURGH PA 15219

TECHNICAL ENGINEERING LLC  
100 CHAPEL RD  
MANCHESTER CT 06042

VERTECS  
8402 RAYSON RD  
HOUSTON TX 77080

ABB  
13609 INDUSTRIAL RD GATE 5  
COMPLEX 3G WEST  
HOUSTON TX 77015

